

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 1:17-CR-151
	§	
MOHAMED IBRAHIM AHMED	§	
a.k.a. "Talha," "Mohammed El Eritri,"	§	
"Abu Zakaria"	§	

GOVERNMENT'S RESPONSE TO DEFENDANT'S OBJECTIONS

On March 4, 2020 the defendant filed two pro se objections. The defendant first objects to the Government's request to redact the testimony of George Gutierrez. Second, the defendant objects to the substitution of physical evidence for record purposes.

The Government has not redacted any testimony from George Gutierrez. Consistent with local rules, the parties are given 7 days to redact personal identifying information from a transcript before it becomes public. This is done to protect witnesses' personal information from public disclosure. In this case, no redactions have been made, and the defendant's objection lacks merit.

The defendant's second objection similarly lacks merit. As is standard practice in the Eastern District of Texas, the Government retains possession of physical evidence admitted at trial, and substitutes photographs. This allows the appellate courts to be aware of what was admitted, but without bearing the burden of securely storing physical evidence. Should any of the substituted physical evidence be needed in the future, it will be available to the defendant, but in the meantime, it will be held by the FBI, in the same manner it was kept in the months or years prior to trial.

Respectfully submitted,

JOSEPH D. BROWN

UNITED STATES ATTORNEY

/s/ Christopher Tortorice

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this response will be electronically filed and available to the defendant. A hard copy of this response will be mailed to the defendant as follows:

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/s/ Christopher Tortorice

CHRISTOPHER TORTORICE

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